IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MACK TRUCKS, INC.,)
Plaintiff,	Civil Action No. 2:07-cv-3737-RBS
v. INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA-UAW, et al.,) HON. R. BARCLAY SURRICK))))
Defendants.)
MARTIN RACHILLA, JOSEPH E. CRAIG, JR., JOHN R. WAHLER, RONALD L. ROYER, DOROTHY GANTZ, CHARLES CULLEY DAVID MOORE, on behalf of themselves and a similarly situated class, and INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA – UAW,))<
Plaintiffs, vs.))
MACK TRUCKS, INC., and MACK TRUCKS, INC. RETIREE WELFARE BENEFIT PLAN,))))
Defendants.	,)

DECLARATION OF WILLIAM T. JOSEM IN SUPPORT OF REQUEST FOR INTERIM AWARD OF ATTORNEYS FEES

- I, William T. Josem, declare as follows:
 - 1. I am one of the attorneys for the International Union, UAW in this matter.

- 2. I am a partner in the firm of Cleary & Josem LLP, located in Philadelphia, PA.
- 3. I have been a partner in Cleary & Josem LLP for twenty (20) years and have practiced law for more than thirty (30) years.
- 4. I graduated magna cum laude from the Georgetown University Law Center in 1980. I have been a member of the Bar of the Commonwealth of Pennsylvania since 1980. I am also a member of the bars of the States of New Jersey and New York, as well as numerous federal courts.
- 5. My practice is concentrated in the areas of labor law, ERISA welfare and pension law. I regularly represent labor unions, as well as multiemployer employee benefit plans.
- 6. Cassie Ehrenberg is an associate in the firm of Cleary & Josem LLP and has been employed by the firm for the past ten (10) years. Ms. Ehrenberg is a graduate of the Cornell Law School. Before joining Cleary & Josem LLP, Ms. Ehrenberg completed a clerkship under the Chief Justice of the New Jersey Supreme Court.
- 7. Attached to this Declaration is a listing of the legal services performed by myself and Ms. Ehrenberg in connection with this case from the inception through June 3, 2011. The attached exhibit reflects that I spent a total of 72 hours on this matter, while Ms. Ehrenberg spent a total of 143 hours on the case. The time records upon which this exhibit is based were maintained contemporaneously with the services rendered.
- 8. Mack Trucks has reviewed the attached exhibit and has agreed that the services were reasonable and warranted and that a rate of \$375 per hour for my services and \$275 per hour for Ms. Ehrenberg's services is also reasonable and warranted.
 - 9. The fees requested for the inception through June 3, 2011, then, total \$66,325.00.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed this 8th day of September, 2011.

WILLIAM'T JOSEM

CLEARY & JOSEM LLP Slip Listing

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	Selection Criteria
	Selection Chiena
Slip.Classification Slip.Date Clie.Selection Slip.Billed	Open 1/1/2007 - 4/4/2011 Include: UAW-Mack Retiree Yes

Rate Info - identifies rate source and level

Slip ID Dates and Time Posting Status Description 67903 10/11/2007 Billed Telephone call with (Saggau)	TIME G:12932 International Union (User Activity Client Reference WTJ Legal Services UAW-Mack Retiree	Units DNB Time Est. Time Variance 0.25 0.00 0.00 0.00
67904 10/12/2007 Billed Review of Complain	ПМЕ G:12932 nt	12/19/2007	WTJ Legal Services UAW-Mack Retiree	0.50 0.00 0.00 0.00
International Union	TIME G:12932 of correspondence f Counsel, Correspon Counsel, Telephone Counsel	rom dence with	WTJ Legal Services UAW-Mack Retiree	0.50 0.00 0.00 0.00
67906 10/17/2007 Billed Telephone call with review of correspor	TIME G:12932 Local President, Rendence, Review of Co	eceipt and	WTJ Legal Services UAW-Mack Retiree	1.00 0.00 0.00 0.00
67907 10/19/2007 Billed Telephone call with	TIME G:12932 n International Union		WTJ Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
67908 10/22/2007 Billed Preparation of Ans	TIME G:12932 swer	12/19/2007	WTJ Legal Services UAW-Mack Retiree	1.50 0.00 0.00 0.00

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CLEARY & JOSEM LLP 4/4/2011 Slip Listing 1:33 PM Units User Slip ID **DNB Time** Activity Dates and Time Est. Time Client Posting Status Variance Reference Description 0.75 $\overline{\mathsf{WTJ}}$ TIME 67909 0.00 Legal Services 10/23/2007 0.00 12/19/2007 UAW-Mack Retiree G:12932 Billed 0.00 Telephone call with International Union Counsel (Saggau); Telephone call with Carl Breininger; Finalization and filing of Answer 1.00 WTJ 68460 TIME 0.00 Legal Services 11/7/2007 0.00 12/19/2007 UAW-Mack Retiree G:12932 Billed 0.00 Telephone conference call with International Union Counsel and Attorney; Telephone call with Attorney for Employer 0.25 CRE TIME 67974 0.00 Legal Services 11/13/2007 0.00 12/19/2007 UAW-Mack Retiree G:12932 Billed 0.00 Interoffice conference re: background and status of case and next steps. 1.75 WTJ TIME 68481 0.00 11/13/2007 Legal Services 0.00 12/19/2007 UAW-Mack Retiree G:12932 Billed 0.00 Receipt and review of correspondence from Attorney (Lye); Receipt and review of Documents; Telephone call with International Union Counsel (Saggau) 0.50 WTJ TIME 68494 0.00 Legal Services 11/15/2007 0.00 12/19/2007 UAW-Mack Retiree G:12932 Billed 0.00 Telephone calls Opposing Counsel; Review of background material in file; Correspondence with International Union Counsel (Saggau) 0.25 WTJ TIME 68516 0.00 Legal Services 11/20/2007 0.00 12/19/2007 UAW-Mack Retiree G:12932 Billed 0.00 Telephone call with Opposing Counsel 0.25 WTJ TIME 68529 0.00 Legal Services 11/26/2007 0.00 12/19/2007 UAW-Mack Retiree G:12932 Billed 0.00 Receipt and review of correspondence from International Union Counsel (Saggau) 0.50 WTJ TIME 68535 0.00

11/27/2007

Billed

G:12932

Legal Services

12/19/2007 UAW-Mack Retiree

0.00

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Slip ID Dates and Time Posting Status Description Telephone calls w	rith Opposing Coun	sel;	User Activity Client Reference	Units DNB Time Est. Time Variance 0.00
Correspondence v 68548 11/28/2007 Billed Receipt and revie	with International Un TIME G:12932 w of correspondence in Counsel (Saggau with International U	12/19/2007 ce from	WTJ Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
68564 11/29/2007 Billed	TIME G:12932 :: Motion to Dismis	12/19/2007	WTJ Legal Services UAW-Mack Retiree	2.00 0.00 0.00 0.00
68576 12/4/2007 Billed Receipt and revie Union Counsel (S	TIME G:13027 bw of Documents from Saggau)		WTJ Legal Services UAW-Mack Retiree	0.75 0.00 0.00 0.00
68103 12/4/2007 Billed Interoffice confer filed.	TIME G:13027 ence re: upcoming		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
68112 12/5/2007 Billed Review of file, do	TIME G:13027 ocket and additional		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
Certification, Re	TIME G:13027 ew of Plaintiffs Mot view of Court rules; esponse to Motion.	tion for Class interoffice	CRE Legal Services 3 UAW-Mack Retiree	0.50 0.00 0.00 0.00
call with Internation	TIME G:13027 with Attorney for Mattional Union Counse with International liew of Motion for Cl	ack; Telephone el (Saggau); Union Counsel;	WTJ Legal Services B UAW-Mack Retiree	1.25 0.00 0.00 0.00

CLEARY & JOSEM LLP Slip Listing

Slip ID Dates and Time Posting Status Description 68886 12/7/2007 Billed Reply brief.	TIME G:13027		User Activity Client Reference CRE Legal Services UAW-Mack Retiree	Units DNB Time Est. Time Variance 0.50 0.00 0.00 0.00
68662 12/10/2007 Billed Telephone call with and review of correct Union Counsel	TIME G:13027 Attorney for Employespondence from Interr	er; Receipt	WTJ Legal Services UAW-Mack Retiree	0.50 0.00 0.00 0.00
68907 12/11/2007 Billed Stipulation for exte with Opposing Cou	TIME G:13027 nsion of time; Corresp nsel.		CRE Legal Services UAW-Mack Retiree	0.50 0.00 0.00 0.00
68905 12/11/2007 Billed Legal research re: call with Court.	TIME G:13027 timing of briefs and To		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
68903 12/11/2007 Billed Telephone call with of time.	TIME G:13027 n Opposing Counsel r		CRE Legal Services UAW-Mack Retiree on	0.25 0.00 0.00 0.00
68908 12/12/2007 Billed Receipt and reviev	TIME G:13027 v of Opposing Counse		CRE Legal Services 3 UAW-Mack Retiree	0.25 0.00 0.00 0.00
68914 12/12/2007 Billed Filing of Stipulatio	TIME G:13027 n of Counsel.	1/15/2008	CRE Legal Services 3 UAW-Mack Retiree	0.25 0.00 0.00 0.00
68671 12/12/2007 Billed Telephone call wit (Saggau); Review	TIME G:13027 th International Union of Motion		WTJ Legal Services 8 UAW-Mack Retiree	0.25 0.00 0.00 0.00

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Page Slip Listing 1:33 PM Units User Slip ID **DNB Time** Activity Dates and Time Est. Time Client Posting Status Variance Reference Description 0.75 WTJ TIME 68695 0.00 Legal Services 12/18/2007 1/15/2008 UAW-Mack Retiree 0.00 G:13027 Billed 0.00 Interoffice Conference; Telephone conference call with International Union Counsel (Saggau) 2.50 CRE TIME 68935 0.00 Legal Services 12/18/2007 1/15/2008 UAW-Mack Retiree 0.00 G:13027 Billed 0.00 Review of Motion and Brief, Legal research re: response; Telephone call with UAW General Counsel re: potential dismissal, preliminary injunction, VEBA and other issues. 3.50 CRE TIME 68947 0.00 Legal Services 12/19/2007 0.00 1/15/2008 UAW-Mack Retiree G:13027 Billed 0.00 Brief in Opposition to Class Certification. 5.00 **CRE** TIME 68960 0.00 Legal Services 12/20/2007 0.00 1/15/2008 UAW-Mack Retiree G:13027 Billed 0.00 Brief in Opposition to Class Certification. 0.50 WTJ TIME 68706 0.00 Legal Services 12/20/2007 0.00 1/15/2008 UAW-Mack Retiree G:13027 Billed 0.00 Telephone call with Area Director (Blake); Interoffice Conference 6.00 CRE TIME 68965 0.00 Legal Services 12/21/2007 0.00 1/15/2008 UAW-Mack Retiree G:13027 Billed 0.00 Brief in Opposition to Class Certification. 0.75 WTJ TIME 68709 0.00 Legal Services 12/21/2007 0.00 1/15/2008 UAW-Mack Retiree G:13027 Billed 0.00 Telephone call with International Union Representative (Saggau) and Attorney for Employer; Receipt and review of correspondence 3.00 WTJ TIME 68717 0.00 Legal Services 12/26/2007 0.00 1/15/2008 UAW-Mack Retiree G:13027 Billed 0.00 Meeting with Area Director (Blake) and retired International Union Representative (Dannenhower); Travel to and from Meeting

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Page Slip Listing 1:33 PM Units User Slip ID **DNB Time** Activity **Dates and Time** Est. Time Client **Posting Status** Variance Reference Description 4.00 CRE TIME 68967 0.00 Legal Services 12/26/2007 0.00 1/15/2008 UAW-Mack Retiree G:13027 Billed 0.00 Meeting with UAW representatives. 3.50 CRE TIME 68969 0.00 Legal Services 12/26/2007 0.00 1/15/2008 UAW-Mack Retiree G:13027 Billed 0.00 Opposition to Motion for defendant class certification. 7.75 CRE TIME 68972 0.00 Legal Services 12/27/2007 0.00 1/15/2008 UAW-Mack Retiree G:13027 Billed 0.00 Memorandum of Law in Opposition to Class Certification, drafting declaration and proposed order. 1.00 WTJ TIME 68720 0.00 Legal Services 12/28/2007 0.00 1/15/2008 UAW-Mack Retiree G:13027 Billed 0.00 Interoffice Conference; Review of and Revision to Brief in Opposition to Motion for Class Certification 2.50 CRE 68974 TIME 0.00 Legal Services 12/28/2007 0.00 1/15/2008 UAW-Mack Retiree Billed G:13027 0.00 Memorandum of Law in Opposition to Motion for Class Certification. 0.25 CRE TIME 69003 0.00 Legal Services 1/3/2008 0.00 2/28/2008 UAW-Mack Retiree G:13095 Billed 0.00 Receipt and review of Correspondence from Opposing Counsel and interoffice conference re: response. 0.50 WTJ TIME 68749 0.00 Legal Services 1/7/2008 0.00 2/28/2008 UAW-Mack Retiree G:13095 Billed 0.00 Telephone call with Attorney for Employer; Intraoffice Conference 0.25 CRE TIME 69026 0.00 Legal Services 1/7/2008 0.00 2/28/2008 UAW-Mack Retiree G:13095 Billed 0.00 Interoffice conference re: class action Complaint and class defined.

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1:33 PM Slip Listing

Slip ID Dates and Time Posting Status Description 69441 1/11/2008 Billed Drafting proposed of review of plaintiffs rewith UAW General	TIME G:13095 class subcategores; Footion and brief; Corre	2/28/2008 Receipt and	User Activity Client Reference CRE Legal Services UAW-Mack Retiree	Units DNB Time Est. Time Variance 2.50 0.00 0.00 0.00
69457 1/15/2008 Billed	TIME G:13095 UAW GC re: class of		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
69461 1/15/2008 Billed Legal research re:	TIME G:13095 potential sub-classific		CRE Legal Services UAW-Mack Retiree	0.75 0.00 0.00 0.00
69464 1/16/2008 Billed Researching and p definitions.	TIME G:13095 reparing potential cla		CRE Legal Services UAW-Mack Retiree	0.50 0.00 0.00 0.00
69719 1/18/2008 Billed Telephone call with	TIME G:13095 Defendant (Breining		WTJ Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
69491 1/21/2008 Billed Telephone call with issues.	TIME G:13095 n Opposing Counsel r		CRE Legal Services UAW-Mack Retiree g	0.25 0.00 0.00 0.00
69727 1/21/2008 Billed Telephone call wit	TIME G:13095 h Attorney for Employ		WTJ Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
Review of Employ	TIME G:13095 from Associate Gener er Correspondence to nce re: plaintiffs class	ral Counsel; retirees,	CRE Legal Services 3 UAW-Mack Retiree	1.00 0.00 0.00 0.00

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4/4/2011 1:33 PM	CLEARY & JOSEM LLP Slip Listing			
Slip ID Dates and Time Posting Status Description 69767	TIME	User Activity Client Reference WTJ	Units DNB Time Est. Time Variance 0.50	
1/25/2008 Billed Receipt and reviev	v of correspondence from n Counsel (Saggau); Telephone	Legal Services B UAW-Mack Retiree	0.00 0.00 0.00	
69521 1/28/2008 Billed Telephone call wit plaintiffs class ac	h Opposing Counsel re: potentia	CRE Legal Services 3 UAW-Mack Retiree	0.25 0.00 0.00 0.00	
and review of com Union Counsel (S	TIME G:13095 Attorney for Employer; Receip espondence from International aggau); Telephone call with Local particular (Blake)		1.00 0.00 0.00 0.00	
class action com Associate Genera	TIME G:13095 changes in health care for plaintif plaint; Telephone call with al Counsel and interoffice rategy, complaint and preliminary		1.00 0.00 0.00 0.00	
with International	TIME G:13095 ound material in file; Telephone of Union Counsel (Saggau); Legal on for Preliminary Injunction	WTJ Legal Services 98 UAW-Mack Retiree call	2.50 0.00 0.00 0.00	
injunction; intero	TIME G:13095 nt; Legat research re: preliminary ffice conference re: strategy; with Associate General Counse		7.00 0.00 0.00 0.00	
69794 1/30/2008 Billed Intra-office Confe	TIME G:13095 2/28/20 erence; Correspondence with	WTJ Legal Services 08 UAW-Mack Retiree	0.50 0.00 0.00 0.00	

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Slip ID Dates and Time Posting Status Description International Union	Counsel (Saggau)	User Activity Client Reference	Units DNB Time Est. Time Variance		
69812 1/31/2008 Billed Telephone conferer	ТІМЕ	WTJ Legal Services 8 UAW-Mack Retiree tor	0.50 0.00 0.00 0.00		
injunction; Telepho	TIME G:13095 ; Legal research re: preliminary one call with Associate General e conference re: strategy aints on preliminary injunction.	CRE Legal Services 8 UAW-Mack Retiree	3.00 0.00 0.00 0.00		
69550 1/31/2008 Billed Review of collectiv proposed changes	TIME G:13095 e bargaining agreements and to retiree health benefits.	CRE Legal Services 08 UAW-Mack Retiree	2.00 0.00 0.00 0.00		
conference with le	TIME G:13149 email correspondence; interofficate interning research needed; ence to Associate General ing drafted Complaint.	CRE Legal Services 08 UAW-Mack Retiree ce	0.50 0.00 0.00 0.00		
69818 2/1/2008 Billed Telephone call wi Telephone call wi	TIME G:13149 3/26/20 th Attorney for Employer; th Area Director (Blake)	WTJ Legal Services 08 UAW-Mack Retiree	0.50 0.00 0.00 0.00		
69567 2/4/2008 Billed Interoffice conferences	TIME G:13149 3/26/20 ence with legal intern re: resear	CRE Legal Services 008 UAW-Mack Retiree ch	0.25 0.00 0.00 0.00		
69566 2/4/2008 Billed Internal Correspo insurance chang	ondence and conference re:	CRE Legal Services 008 UAW-Mack Retiree	0.50 0.00 0.00 0.00		

4/4/2011 1:33 PM		CLEA	RY & JOSEM LLP Slip Listing		Page	10
Slip ID Dates and Time Posting Status Description	TIME		User Activity Client Reference WTJ	Units DNB Time Est. Time Variance 0.25		
69821 2/4/2008 Billed Telephone call witl		3/26/2008	Legal Services UAW-Mack Retiree	0.00 0.00 0.00		
69571 2/5/2008 Billed Research and me comparison.	TIME G:13149 morandum re: benefits	3/26/2008	CRE Legal Services UAW-Mack Retiree	1.25 0.00 0.00 0.00		
69836 2/5/2008 Billed Review of Benefit Correspondence v (Saggau)	TIME G:13149 Chart; Review of Affida with International Unior	wit;	WTJ Legal Services UAW-Mack Retiree	0.50 0.00 0.00 0.00		
69853 2/7/2008 Billed Telephone call wi and review of con Union Counsel (S	TIME G:13149 th Attorney for Employ respondence from Interestaggau)	er; Receipt	WTJ Legal Services B UAW-Mack Retiree	0.25 0.00 0.00 0.00		
69603 2/8/2008 Billed Telephone call w interoffice conference of emails	TIME G:13149 ith UAW General Cour ence re: strategy; Rec from UAW GC.	nsel;	CRE Legal Services 8 UAW-Mack Retiree	0.50 0.00 0.00 0.00		
Counsel (Sagga	TIME G:13149 rence call with Internal u); Receipt and review from International Unic	tional Unior of on Counsel;		0.50 0.00 0.00 0.00		
69616 2/11/2008 Billed Correspondence Receipt and rev Opposing Coun	TIME G:13149 e with UAW General Cliew of Correspondencesel.	ounsel;	CRE Legal Services 08 UAW-Mack Retiree	0.25 0.00 0.00 0.00		

4/4/2011 1:33 PM	CLE	ARY & JOSEM LLP Slip Listing		Page	11
Slip ID Dates and Time Posting Status Description		User Activity Client Reference	Units DNB Time Est. Time Variance 1.00		
69887 2/13/2008 Billed Telephone calls wi	TIME G:13149 3/26/2009 th International Union Counsel ne conference call with 1 Counsel and Attorney for	WTJ Legal Services 3 UAW-Mack Retiree	0.00 0.00 0.00		
69635 2/13/2008 Billed Conference call with Counsel and Opportunity	ith UAW Associate General osing Counsel re VEBA	CRE Legal Services 8 UAW-Mack Retiree	1.00 0.00 0.00 0.00		
70454 2/18/2008 Billed Receipt and revie possible settleme	TIME G: 13149 w of Court's order regarding ent in Arvinmeritor case.	CRE Legal Services 08 UAW-Mack Retiree	0.25 0.00 0.00 0.00		
International Unic	TIME G:13149 3/26/20 ew of Correspondence from on Counsel and review of ng to civil suspense and VEBA	CRE Legal Services 08 UAW-Mack Retiree	0.25 0.00 0.00 0.00		
(Saggau): Recei	TIME G:13149 3/26/20 with International Union Counsel pt and review of correspondence al Union Counsel	WTJ Legal Services 008 UAW-Mack Retiree	0.50 0.00 0.00 0.00		
International Lin	TIME G:13149 3/26/2 iew of correspondence from ion Counsel (Saggau); e with International Union Couns	WTJ Legal Services 008 UAW-Mack Retiree	0.25 0.00 0.00 0.00		
70536 3/3/2008 Billed Receipt and rev Associate Gen	iew of Correspondence from	CRE Legal Services 2008 UAW-Mack Retiree	0.25 0.00 0.00 0.00		

CLEARY & JOSEM LLP Slip Listing

Slip ID Dates and Time Posting Status Description			User Activity Client Reference	Units DNB Time Est. Time Variance 0.25
70777 3/3/2008 Billed Receipt and review International Union	of correspondence from	4/16/2008	WTJ Legal Services UAW-Mack Retiree	0.00 0.00 0.00
70778 3/3/2008 Billed Receipt and review International Union	of correspondence fro		WTJ Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
International Union of Motion: Correspondent	TIME G:13230 of correspondence from Counsel (Saggau); Propondence with Internation call with Attorney for	om reparation onal Union	WTJ Legal Services UAW-Mack Retiree	1.75 0.00 0.00 0.00
70840 3/11/2008 Billed Receipt and review for Employer; Corre	TIME G:13230 of correspondence from the content of the correspondence with Attornation of the co	om Attorne	WTJ Legal Services UAW-Mack Retiree y	0.25 0.00 0.00 0.00
70834 3/11/2008 Billed Telephone call witl (Saggau); Revisior with Attorney for E	TIME G:13230 h International Union Conto Conto Motion; Corrections of the Correction	Counsel	WTJ Legal Services 3 UAW-Mack Retiree se	0.50 0.00 0.00 0.00
70845 3/12/2008 Billed Telephone call wit Correspondence v	TIME G:13230 h Attomey for Employ vith Breininger		WTJ Legal Services 3 UAW-Mack Retiree	0.50 0.00 0.00 0.00
71419 3/14/2008 Billed Overnight mail	EXP G:13230	4/16/200	WTJ \$Overnight mail 8 UAW-Mack Retiree	1
71281 3/25/2008 Billed	TIME G:13230	4/16/200	WTJ Legal Services 8 UAW-Mack Retiree	0.25 0.00 0.00

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CLEARY & JOSEM LLP 4/4/2011 Slip Listing 1:33 PM Units User Slip ID **DNB Time** Activity Dates and Time Est. Time Client Posting Status Variance Reference Description 0.00 Receipt and review of Order; Correspondence with International Union Counsel (Saggau) 0.25 WTJ TIME 71303 0.00 Legal Services 3/28/2008 0.00 4/16/2008 UAW-Mack Retiree G:13230 Billed 0.00 Receipt and review of correspondence from Attorney 0.25 WTJ TIME 71314 0.00 Legal Services 3/31/2008 0.00 4/16/2008 UAW-Mack Retiree G:13230 Billed 0.00 Receipt and review of correspondence from International Union Counsel; Correspondence with International Union Counsel 0.25 LTW TIME 71334 0.00 Legal Services 4/2/2008 0.00 5/28/2008 UAW-Mack Retiree G:13295 Billed 0.00 Telephone call with International Union Representative and Local President; Correspondence with International Union Counsel (Saggau) 0.50 WTJ TIME 71343 0.00 Legal Services 4/7/2008 0.00 5/28/2008 UAW-Mack Retiree G:13295 Billed 0.00 Telephone conference call with Attorneys (Seltzer & Burgess); Review of File 0.50 WTJ 71348 TIME 0.00 Legal Services 4/8/2008 0.00 5/28/2008 UAW-Mack Retiree G:13295 Billed 0.00 Telephone calls with Attorney (Seltzer); Review of file 0.25 WTJ TIME 72378 0.00 Legal Services 5/19/2008 0.00 6/27/2008 UAW-Mack Retiree G:13350 Billed 0.00 Receipt and review of correspondence from International Union Counsel; Correspondence with International Union Counsel (Saggau) 0.50 WTJ TIME 72386 · 0.00 Legal Services 5/22/2008 6/27/2008 UAW-Mack Retiree 0.00 G:13350

Billed

Telephone call with International Union Counsel (Saggau); Review of background material in file

CLEARY & JOSEM LLP Slip Listing

Slip ID			User Activity	Units DNB Time
Dates and Time Posting Status			Client	Est. Time
Description			Reference	Variance
72396	TIME		WTJ	0.50 0.00
5/27/2008	0.40050	6/27/2008	Legal Services UAW-Mack Retiree	0.00
Billed Review of backgrou	G:13350 nd material in file; Re		OAVV-Wack Notifice	0.00
pending Motions				
72419	TIME		WTJ	2.00 0.00
5/30/2008	0.42250	6/27/2008	Legal Services UAW-Mack Retiree	0.00
Billed Telephone call with	G:13350 International Union C		OAVV-Mack Notifice	0.00
(Saggau); Legal res	search re: Motion to [Dismiss		
72429	ТІМЕ		WTJ	2.00
6/1/2008			Legal Services	0.00 0.00
Billed	G:13432	7/22/2008	UAW-Mack Retiree	0.00
Legal research re:	MOtion to Distriss			
72430	TIME		WTJ	1.75 0.00
6/2/2008	G:13432	7/22/2008	Legal Services UAW-Mack Retiree	0.00
Billed Legal research re:		112212000	o, w made name	0.00
72451	πмε		WTJ	1.50
6/5/2008			Legal Services	0.00 0.00
Billed	G:13432	7/22/2008	UAW-Mack Retiree	0.00
Review of Docume	nts			
72457	ПМЕ		WTJ	6.25 0.00
6/9/2008 Billed	G:13432	7/22/2008	Legal Services UAW-Mack Retiree	0.00
Telephone call with	h International Union	Counsel		0.00
(Saggau); Legal re	search re: Motion to	Dismiss		
73112	TIME		WTJ	4.75
6/24/2008	0.40400	7/22/2009	Legal Services 3 UAW-Mack Retiree	0.00 0.00
Billed	G:13432 subject matter juriso		OAVV-WIGGR Nethloo	0.00
Preparation of Leg	al Memorandum; Coi	rresponden	ce	
with International	Union Counsel (Sagg	au)		
74507	TIME		CRE	0.50 0.00
9/8/2008	G:13654	10/24/200	Legal Services 8 UAW-Mack Retiree	0.00
Billed Receipt and revieu	w of email internal em		o of the magnitude	0.00
correspondence. I	review of filings; interc	office		
conference re: pot	tential preliminary inju	unction		
motion.				

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CLEARY & JOSEM LLP 4/4/2011 Slip Listing 1:33 PM Units User Slip ID **DNB Time** Activity Dates and Time Est. Time Client Posting Status Variance Reference Description 0.50 CRE TIME 74510 0.00 Legal Services 9/8/2008 0.00 10/24/2008 UAW-Mack Retiree G:13654 Billed 0.00 Receipt and review of email internal email correspondence, review of filings; interoffice conference re: potential preliminary injunction motion. 0.75 CRE TIME 74517 0.00 Legal Services 9/9/2008 0.00 10/24/2008 UAW-Mack Retiree G:13654 Billed 0.00 Telephone call with Associate General Counsel re: preliminary injunction; review of research; interoffice memorandum re: preliminary injunction considerations and tactics. 0.25 CRE 74519 TIME 0.00 Legal Services 9/10/2008 0.00 10/24/2008 UAW-Mack Retiree G:13654 Billed 0.00 Receipt and review of internal email Correspondence re: preliminary injunction strategy. 1.25 CRE TIME 74529 0.00 Legal Services 9/10/2008 0.00 10/24/2008 UAW-Mack Retiree G:13654 Billed 0.00 Research for preliminary injunction; interoffice conference re: strategy. 0.25 **CRE** TIME 74562 0.00 Legal Services 9/16/2008

10/24/2008 UAW-Mack Retiree 0.00 G:13654 Billed 0.00 Legal research re: injunctions and 3rd circuit standard. 1.25 CRE TIME 74566 0.00 Legal Services 9/17/2008 0.00 10/24/2008 UAW-Mack Retiree G:13654 Billed 0.00 Legal research re: preliminary injunction. 0.50 WTJ TIME 75207 0.00 Legal Services 9/18/2008 0.00 10/24/2008 UAW-Mack Retiree G:13654 Billed 0.00 Telephone conference call with International Union Counsel (Saggau) 1.00 **CRE** TIME 74571 0.00 Legal Services 9/18/2008 0.00 10/24/2008 UAW-Mack Retiree G:13654 Billed

CLEARY & JOSEM LLP Slip Listing

Slip ID Dates and Time Posting Status Description Conference call wit interoffice conferen	th General Counsel's ce re: Third Circuit s	office;	User Activity Client Reference	Units DNB Time Est. Time Variance 0.00
75630 9/26/2008 Billed Interoffice conferencase.	TIME G:13654 ace re: new research	10/24/2008	CRE Legal Services UAW-Mack Retiree f	0.25 0.00 0.00 0.00
75925 10/15/2008 Billed Telephone call with Counsel re: new s	TIME G:13736 h UAW Associate Ge trategy, MTD, chang	eneral	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
75927 10/15/2008 Billed Motion for Judgme re: jurisdiction, ver Associate Genera	TIME G:13736 ent on Pleadings; Leg nue, etc.; Telephone I Counsel.	gal research	CRE Legal Services UAW-Mack Retiree	5.50 0.00 0.00 0.00
75934 10/16/2008 Billed Motion for Judgme	TIME G:13736 ent on the Pleadings.		CRE Legal Services UAW-Mack Retiree	4.00 0.00 0.00 0.00
75937 10/17/2008 Billed Brief in support of Pleadings.	TIME G:13736 Motion for Judgmen		CRE Legal Services UAW-Mack Retiree	5.00 0.00 0.00 0.00
75938 10/18/2008 Billed Brief in support o Pleadings.	TIME G:13736 f Motion for Judgmen	11/26/2008	CRE B Legal Services B UAW-Mack Retiree	1.00 0.00 0.00 0.00
Pleadings; Corres	TIME G:13736 f Motion for Judgmenspondence with Associand review of Correspondence Ire: fi	nt on the ociate Gener spondence	CRE Legal Services 3 UAW-Mack Retiree al	1.50 0.00 0.00 0.00

CLEARY & JOSEM LLP Slip Listing

Slip ID			User	Units
Dates and Time			Activity	DNB Time
Posting Status			Client	Est. Time
Description			Reference	Variance
75964	TIME		CRE	0.25 0.00
10/22/2008		44/00/0000	Legal Services UAW-Mack Retiree	0.00
Billed	G:13736		UAVV-IVIACK Retiree	0.00
Interoffice Correspo	ndence re: status of	case.		0.00
75969	TIME		CRE	0.50
10/22/2008			Legal Services	0.00
Billed	G:13736		UAW-Mack Retiree	0.00
Telephone call with review of file re: rev	Associate General isions to brief.	Counsel;		0.00
75970	ПМЕ		CRE	0.50
10/22/2008			Legal Services	0.00
Billed	G:13736		UAW-Mack Retiree	0.00
Legal research re:	vesting and jurisdicti	on for		0.00
dismissal brief, into of research.	eroffice Memorandun	re; results		
75980	TIME		CRE	2.00
10/27/2008			Legal Services	0.00
Billed	G:13736		UAW-Mack Retiree	0.00 0.00
Receipt and review	of email from Detroi	t Diesel		0.00
counsel re: Motion	for Judgment on Ple	eadings;	:	
interoffice conferen	ce re: strategy; revis	nons to phei	•	
75975	TIME		CRE	0.25
10/27/2008	*****		Legal Services	0.00
Billed	G:13736		UAW-Mack Retiree	0.00
Receipt and review	of Complaint in Mic	higan.		0.00
75971	ПМЕ		CRE	0.50
10/27/2008	11141		Legal Services	0.00
Billed	G:13736	11/26/2008	UAW-Mack Retiree	0.00
Interoffice conferer	nce re: status of Con	nplaint, brief,		0.00
filing; Receipt and	review of Correspond	dence from		
Associate Genera	l Counsel, counsel ir	n Detroit		
Diesel litigation.				
75982	TIME		CRE	4.75
10/28/2008	(IIVI has		Legal Services	0.00
Billed	G:13736	11/26/2008	3 UAW-Mack Retiree	0.00
	email Corresponden			0.00
from Associate Ge	eneral Counsel; inter	office		
conference re: stra	ategy; Telephone cal	I with UAW		
local counsel for [Detroit Diesel case.			

CLEARY & JOSEM LLP Slip Listing

Slip ID Dates and Time Posting Status Description 75989 10/29/2008 Billed Revision to brief, et Associate General fashioning of reque	TIME G:13736 mail Correspondence Counsel re: revisions	11/26/2008	User Activity Client Reference CRE Legal Services UAW-Mack Retiree	Units DNB Time Est. Time Variance 0.25 0.00 0.00 0.00
76180 10/29/2008 Billed Review of and Revi re transfer to E.D.	TIME G:13736 sion to Brief in Supp Michigan		WTJ Legal Services UAW-Mack Retiree	0.50 0.00 0.00 0.00
75999 10/30/2008 Billed Email Corresponde Counsel.	TIME G:13736 ence with Associate		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
brief to be filed: Re	TIME G:13810 h Associate General eceipt and review of If to be filed; interofficetc.	Counsel re:	CRE Legal Services UAW-Mack Retiree	1.00 0.00 0.00 0.00
76086 11/13/2008 Billed Telephone call wit Legal research re	TIME G:13810 th Associate Genera t fashioning motion.		CRE Legal Services B UAW-Mack Retiree	0.75 0.00 0.00 0.00
76093 11/14/2008 Billed Brief.	ПМЕ G:13810	12/30/2008	CRE Legal Services 3 UAW-Mack Retiree	4.00 0.00 0.00 0.00
76095 11/15/2008 Billed Brief.	TIME G:13810	11/16/200 12/30/200	CRE 8 Legal Services 8 UAW-Mack Retiree	1.50 0.00 0.00 0.00
76096 11/17/2008 Billed Email Correspond Counsel; Telepho	TIME G:13810 dence with Associate one calls with Assoc	e General	CRE Legal Services 8 UAW-Mack Retiree	4.00 0.00 0.00 0.00

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Slip ID Dates and Time Posting Status Description Counsel; revisions re; brief.	to brief; interoffice conferences	User Activity Client Reference	Units DNB Time Est. Time Variance		
76279 11/17/2008 Billed Review of Brief	TIME G:13810 12/30/200	WTJ Legal Services 8 UAW-Mack Retiree	0.50 0.00 0.00 0.00		
76761 11/18/2008 Billed Legal research re: Correspondence wifinalizing brief.	TIME G:13810 12/30/200 personal jurisdiction, email ith Associate General Counsel;	CRE Legal Services 8 UAW-Mack Retiree	2.00 0.00 0.00 0.00		
77364 11/19/2008 Billed Telephone call with International Union	TIME G:13810 12/30/200 A Area Director (Blake) and Counsel (Saggau and Sodko)	WTJ Legal Services 8 UAW-Mack Retiree	1.00 0.00 0.00 0.00		
executed settleme	TIME G:13810 of Correspondence and ent agreement from Plaintiff; emoith General Counsel.	CRE Legal Services 08 UAW-Mack Retiree ail	0.25 0.00 0.00 0.00		
76768 11/19/2008 Billed Telephone call with revisions to brief; p	TIME G:13810 12/30/200 h Associate General Counsel; prepare exhibits and brief for fili	CRE Legal Services 08 UAW-Mack Retiree ng.	1.75 0.00 0.00 0.00		
77001 11/21/2008 Billed Receipt and reviev Opposing Counse Associate Genera	v of Correspondence from I and email Correspondence wi	CRE Legal Services 08 UAW-Mack Retiree th	0.25 0.00 0.00 0.00		
Correspondence v	TIME G:13810 12/30/20 th Attorney for Employer; with International Union Counsel th International Union Counsel	WTJ Legal Services 08 UAW-Mack Retiree	0.50 0.00 0.00 0.00		

CLEARY & JOSEM LLP Slip Listing

Slip ID Dates and Time Posting Status			User Activity Client Reference	Units DNB Time Est. Time Variance
Description				1.25
77004 11/24/2008 Billed Telephone call with Associate General Michigan counsel;	Counsel; Telephor	12/30/2008 pondence with	CRE Legal Services UAW-Mack Retiree	0.00 0.00 0.00
77016	TIME		CRE	0.75 0.00
11/25/2008 Billed Review of Corresponding Counsel Associate General	; email Correspond	hments from dence with	Legal Services UAW-Mack Retiree	0.00 0.00
77066	TIME		CRE	0.25
12/8/2008			Legal Services	0.00
Billed	G:13904		UAW-Mack Retiree	0.00 0.00
Internal email Corr Correspondence w	espondence and e vith Associate Gen	mail eral Counsel.		0.00
77082	πмε		CRE	1.00
12/9/2008			Legal Services	0.00
Billed Review of Rachilla	G:13904 lawsuit motions a		UAW-Mack Retiree	0.00 0.00
77112	ПМЕ		CRE	2.50
12/12/2008			Legal Services	0.00
Billed	G:13904		UAW-Mack Retiree	0.00
interoffice confere Correspondence v	w of Company's op nce re: brief; email with client and Mic ules re: reply brief;	i higan counsel;		0.00
77116	TIME		CRE	0.75 0.00
12/15/2008		4 (0.0 (0.000)	Legal Services	0.00
paralegal; review of Telephone call with	G:13904 th UAW Legal Dep of local rules re: fil th Judge's chambe spondence with As	partment ing deadlines; ers re: filing rep	O UAW-Mack Retiree ly al	0.00
77126	ПМЕ		CRE	0.25
12/16/2008			Legal Services	0.00
Billed	G:13904 dence with Associ		9 UAW-Mack Retiree	0.00 0.00

CLEARY & JOSEM LLP Slip Listing

Slip ID Dates and Time Posting Status Description		!	User Activity Client Reference	Units DNB Time Est. Time Variance 0.25
77873 12/22/2008 Billed Telephone call with motion to be filed.	TIME G:13904 1/3 Associate General Cour	0/2009	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
opposition; review of	Opposing Counsel re: of local rules; Prepare Mo Brief, Proposed Order,	30/2009	CRE Legal Services UAW-Mack Retiree	1.25 0.00 0.00 0.00
77885 12/23/2008 Billed Review of draft brie	TIME G:13904 1/3 f; revisions to brief; Filing		CRE Legal Services UAW-Mack Retiree	2.25 0.00 0.00 0.00
77877 12/23/2008 Billed Interoffice email Co filed.	TIME G:13904 1/orrespondence re: briefs		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
79269 2/16/2009 Billed Receipt and review Eastern District Co	of decision in Rachilla o		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
79275 2/16/2009 Billed Email Correspond Counsel; Legal reserview of file.	TIME G:14047 ence with Associate Ger search re: retiree health l	neral	CRE Legal Services UAW-Mack Retiree	1.50 0.00 0.00 0.00
79448 2/16/2009 Billed Receipt and review Opposing Counse	TIME G:14047 w of correspondence fron l; Review of Memorandu	n	WTJ Legal Services) UAW-Mack Retiree	0.50 0.00 0.00 0.00
79278 2/17/2009 Billed Receipt and revie	TIME G:14047 w of Correspondence from		CRE Legal Services 9 UAW-Mack Retiree	0.25 0.00 0.00 0.00

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Slip ID Dates and Time Posting Status Description Associate General Legal Department.	Counsel; Telephone ca		User Activity Client Reference	Units DNB Time Est. Time Variance
79302 2/19/2009 Billed Receipt and review Plaintiff.	TIME G:14047 of Correspondence and	4/6/2009	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
research re: local r transferring cases;	TIME G:14047 of Notice of Related Coules and background of internal Correspondentith Associate General Correspondentith Correspondentit	ase; Legal n ce and	CRE Legal Services UAW-Mack Retiree	1.50 0.00 0.00 0.00
79324 2/24/2009 Billed Correspondence w re: judges and tran	TIME G:14047 ith Associate General e sfer of cases; Legal re	Counsel	CRE Legal Services UAW-Mack Retiree	0.50 0.00 0.00 0.00
79341 2/25/2009 Billed Email Corresponde Counsel.	TIME G:14047 ence with Associate G		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
79343 2/25/2009 Billed Telephone call wit voluntary dismissa	TIME G:14047 h Opposing Counsel real of declaratory action.	: potential	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
79371 3/2/2009 Billed Telephone call wit conference re: sta	TIME G:14146 h Opposing Counsel; in htus; email Correspond	nteroffice	CRE Legal Services DUAW-Mack Retiree	0.25 0.00 0.00 0.00
79380 3/3/2009 Billed Telephone call wit Eastern District o	TIME G:14146 th co-counsel re: admis f PA and requesting co	ssion to	CRE Legal Services 9 UAW-Mack Retiree	0.25 0.00 0.00 0.00

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Slip ID Dates and Time Posting Status Description with Judge Golder	1.		User Activity Client Reference	Units DNB Time Est. Time Variance	
79383 3/4/2009 Billed Legal research re rules, status conf with chambers ar	TIME G:14146 : Pro Hac Vice admiserence requests; Teled with co-counsel; elso and from co-couns I counsel; interoffice	4/21/2009 ssion, local ephone calls mail sel and	CRE Legal Services UAW-Mack Retiree	1.75 0.00 0.00 0.00	
79407 3/5/2009 Billed Telephone call wi	TIME G:14146 th Co-counsel	4/21/2009	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00	
conferences and Hac Vice motion	TiME G:14146 ith Rachilla counsel in the Pro Hac Vice forms; Telephone call with Hac Vice privileges.	re: upcoming Filing of Pro	CRE Legal Services UAW-Mack Retiree	1.00 0.00 0.00 0.00	
79580 3/11/2009 Billed Filing fees for Pr Nickelhoff - Ck #	EXP G:14146 o Hac Vice Motion of 18880	—	CRE \$Filing fees UAW-Mack Retiree	1	
79581 3/18/2009 Billed Filing fees for Pr Widick - Ck #18	EXP G:14146 to Hac Vice Motion o 900		CRE \$Filing fees UAW-Mack Retiree	1	
80441 3/20/2009 Billed Receipt and revi co-counsel	TIME G:14146 ew of Correspondence		CRE Legal Services 9 UAW-Mack Retiree	0.25 0.00 0.00 0.00	
80446 3/20/2009 Billed Finalizing motio Court; email Co	TIME G:14146 In to intervene; Telepl Irrespondence with cl	hone call with	CRE Legal Services 9 UAW-Mack Retiree	0.50 0.00 0.00 0.00	

CLEARY & JOSEM LLP Slip Listing

Slip ID			User	Units
Dates and Time			Activity	DNB Time Est. Time
Posting Status			Client Reference	Variance
Description	TUAL		CRE	0.25
80948	TIME		Legal Services	0.00
5/4/2009 Billed	G:14305	7/6/2009	UAW-Mack Retiree	0.00
	v of Correspondence fi			0.00
80959	TIME		CRE	0.50
5/5/2009			Legal Services	0.00
Billed	G:14305		UAW-Mack Retiree	0.00 0.00
Receipt and review Associate General review of docket a	v of Correspondence f il Counsel; drafting let ind rules.	rom ter to Court;		0.00
80972	TIME		CRE	0.50
5/6/2009			Legal Services	0.00
Billed	G:14305		UAW-Mack Retiree	0.00 0.00
Telephone call with letter to Court; eficocounsel and cli	th Opposing Counsel; ling; Correspondence ent.	finalizing with		0.00
81645	ПМЕ		CRE	0.25
5/18/2009			Legal Services	0.00 0.00
Billed	G:14305		UAW-Mack Retiree	0.00
Email Correspond	dence with client re: so	ettiement.		0.00
81651	πмε		CRE	0.25
5/19/2009			Legal Services	0.00
Billed	G:14305		UAW-Mack Retiree	0.00
Receipt and revie with client and cl	w of Court's order, Co ass counsel.	rrespondend	ce	0.00
81663	TIME		CRE	0.25
5/20/2009			Legal Services	0.00
Billed	G:14305		UAW-Mack Retiree	0.00 0.00
Telephone call w case, settlement conferences with	ith Opposing Counsel discussions; upcomin Court.	re: status o ng	it.	0.00
81683	TIME		CRE	0.25
5/22/2009	•		Legal Services	0.00
Billed	G:14305		9 UAW-Mack Retiree	0.00 0.00
Review of rules review of Court's	e: deadlines on Rule 1 docket.	6 conterend	ce;	0.00
81694	TIME		CRE	0.25
5/26/2009		_,_,_	Legal Services	0.00 0.00
Billed	G:14305		9 UAW-Mack Retiree	0.00
Telephone call w	ith Opposing Counsel	re: upcomi	ng	0.00

CLEARY & JOSEM LLP Slip Listing

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Slip ID Dates and Time Posting Status Description Rule 16 conference.			User Activity Client Reference	Units DNB Time Est. Time Variance
5/28/2009	TIME G:14305 nce with cocounsel.	7/6/2009	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
	TIME G:14402 cocounsel re: Rule 1 dation; class certifica	6	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
81765 6/2/2009 Billed Email Corresponder	TIME G:14402 nce with Rachilla cou		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
Rachilla counsel; C	TIME G:14402 of Correspondence to correspondence with 6 Employer's counsel; s order.	o Court from Court;	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
81772 6/2/2009 Billed Receipt and review Correspondence to	TIME G:14402 of Order from Court; lead counsel.		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
81773 6/3/2009 Billed Receipt and review Correspondence wi	TIME G:14402 of Order from Court; ith counsel.		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
82319 6/26/2009 Billed Telephone call with	TIME G:14402 lead counsel re: filin		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
83269 7/13/2009 Billed Receipt and review counsel; Telephone	TIME G:14483 of Motion, brief, etc. e call with class cour	from class	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00

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CLEARY & JOSEM LLP 4/4/2011 Slip Listing 1:33 PM Units User Slip ID **DNB** Time Activity Dates and Time Est. Time Client Posting Status Variance Reference Description 0.25 CRE TIME 84847 0.00 Legal Services 9/8/2009 0.00 11/3/2009 UAW-Mack Retiree G:14665 Billed 0.00 Receipt and review of Court's Orders; interoffice communication re: orders. 0.50 WTJ TIME 95939 0.00 Legal Services 2/27/2010 0.00 1/31/2011 UAW-Mack Retiree G:15953 Billed 0.00 Telephone call with International Union Counsel (Saggau); Receipt and review of correspondence from International Union Counsel 0.50 WTJ 91213 TIME 0.00 Legal Services 5/11/2010 0.00 6/28/2010 UAW-Mack Retiree G:15346 Billed 0.00 Telephone calls with Judge's Clerk; Correspondence with International Union Counsel (Saggau) 0.50 WTJ TIME 96045 0.00 Legal Services 5/11/2010 12/29/2010 UAW-Mack Retiree 0.00 G:15848 Billed 0.00 Telephone calls with Judge's Clerk; Correspondence with International Union Counsel (Saggau) 0.75 WTJ TIME 96046 0.00 Legal Services 6/9/2010 0.00 12/29/2010 UAW-Mack Retiree G:15848 Billed 0.00 Receipt and review of Order; Correspondence with International Union Counsel; Telephone call with Attorney for Employer, Judge's Chambers and Attorney (Nickeloff) 0.25 CRE TIME 96047 0.00 Legal Services 6/9/2010 0.00 12/29/2010 UAW-Mack Retiree G:15848 Billed 0.00 Receipt and review of email Correspondence from Court, from lead counsel, Interoffice Conferences, Telephone calls with Opposing Counsel and Telephone call with lead counsel 0.25 CRE TIME 91558 0.00 Legal Services 6/9/2010 0.00 7/30/2010 UAW-Mack Retiree G:15436 Billed 0.00 Receipt and review of email Correspondence from Court, from lead counsel, interoffice conferences,

Telephone calls with Opposing Counsel and

Telephone call with lead counsel.

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ci:- ID			User	Ųnits
Slip ID Dates and Time Posting Status Description			Activity Client Reference	DNB Time Est. Time Variance
91311 6/9/2010 Billed Receipt and review International Unior	TIME G:15436 of Order, Correspon Counsel; Telephone oyer, Judge's Chambe ()	7/30/2010 dence with call with	WTJ Legal Services UAW-Mack Retiree	0.75 0.00 0.00 0.00
Attorney (Nickelho (Widman and Ben	TIME G:15436 ith International Union off) and Attorney for E der); Telephone confounsel; Corresponder of Counsel	7/30/2010 n Counsel, Employer erence call	WTJ Legal Services UAW-Mack Retiree	1.25 0.00 0.00 0.00
Attorney (Nickelhow) (Widman and Ber	TIME G:15848 rith International Union off) and Attorney for Inder); Telephone confounsel; Corresponder n Counsel	n Counsel, Employer ference call	CRE Legal Services UAW-Mack Retiree	1.25 0.00 0.00 0.00
(Saggau); Teleph	TIME G:15436 th International Unior one conference calls sel; Telephone confe	n Counsel with	WTJ Legal Services UAW-Mack Retiree	1.50 0.00 0.00 0.00
(Saggau): Teleph	TIME G:15848 ith International Unionone conference calls sel; Telephone confe	n Counsel with	WTJ Legal Services) UAW-Mack Retiree th	1.50 0.00 0.00 0.00
95389 10/25/2010 Billed Telephone call w conference call.	TIME G:15776 ith Chambers re: sch		CRE Legal Services 0 UAW-Mack Retiree us	0.25 0.00 0.00 0.00

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Slip ID Dates and Time Posting Status Description 96050 10/25/2010 Billed Telephone call with Conference call	TIME G:15848 Chambers re: scher	12/29/2010 duling status	CRE Legal Services	Units DNB Time Est. Time Variance 0.25 0.00 0.00 0.00 0.00
Billed Correspondence w (MS) re: conferenc chambers re: sche	G:15776 ith Associate Genera e with judge; Telepho duling.	al Counsei	UAW-Mack Retiree	0.00 0.00
96051 10/26/2010 Billed Correspondence w (MS) re: conference with Chambers re:	TIME G:15848 ith Associate General e with Judge; Teleph scheduling	al Counsel	CRE Legal Services UAW-Mack Retiree	0.50 0.00 0.00 0.00
counsel re: schedowith Chambers re:	TIME G:15848 of correspondence uling Conference; Te scheduling; Email oith lead counsel re:	from lead lephone call	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
counsel re: sched with chambers re:	TIME G:15776 v of Correspondence uling conference. Tel scheduling; email vith lead counsel re:	from lead lephone call	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
95433 10/28/2010 Billed Telephone call wit conference call. C participants re: co	TIME G:15776 h Chambers re: schoorrespondence to va	eduling of	CRE Legal Services) UAW-Mack Retiree	0.25 0.00 0.00 0.00
96053 10/28/2010 Billed Telephone call with Conference call; (TIME G:15848 th Chambers re: sch Correspondence with	eduling of	CRE Legal Services O UAW-Mack Retiree	0.25 0.00 0.00 0.00

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Slip ID Dates and Time Posting Status Description participants re: con	ference details		User Activity Client Reference	Units DNB Time Est. Time Variance
Associate General	TIME G:15776 of Correspondence Counsel re: respons status of settlement	11/30/2010 from se to Mack	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
95442 10/29/2010 Billed Review of file for Co Counsel re: settler	TIME G:15776 prrespondence from nent per client reque	Opposing	CRE Legal Services UAW-Mack Retiree	1.00 0.00 0.00 0.00
96054 10/29/2010 Billed Review of File for C Counsel re: settlen	TIME G:15848 Correspondence from nent per client reque	n Opposing	CRE Legal Services UAW-Mack Retiree	1.00 0.00 0.00 0.00
Correspondence w	TIME G:15848 of Court orders and ith UAW Associate) re: upcoming confe	d GC (MS) and	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
96057 11/2/2010 Billed Correspondence w	TIME G:15848 vith Judge re: status		CRE Legal Services UAW-Mack Retiree It	0.25 0.00 0.00 0.00
96058 11/3/2010 Billed Receipt and reviev General Counsel a requesting settlem	TIME G:15848 v of correspondence and from Mack to Cl nent conference	from UAW	CRE Legal Services) UAW-Mack Retiree	0.25 0.00 0.00 0.00
96214 11/29/2010 Billed Status conference	TIME G:15848 e call.	12/29/2010	CRE Legal Services) UAW-Mack Retiree	0.25 0.00 0.00 0.00
97673 1/24/2011 Billed	TIME G:16030	3/18/201	WTJ Legal Services 1 UAW-Mack Retiree	0.25 0.00 0.00

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4/4/2011 1:33 PM	CLEARY & JOSEM LLP Slip Listing			
1,55 F IM		, -		
Slip ID Dates and Time Posting Status Description Telephone call wit with Attomeys (N	th Judge's Clerk; C ickeloff and Saggar	User Activity Client Reference orrespondence	Units DNB Time Est. Time Variance 0.00	
with Attorneys (S	TIME G:16030 vith Judge's Clerk; aggau and Nickelh ondence from Attor	off); Receipt and	0.50 0.00 etiree 0.00 0.00	
97688 1/26/2011 Billed Receipt and revie Court; Review of International Unio	TIME G:16030 w of correspondence Order; Correspondence on Counsel	WTJ Legal Services 3/18/2011 UAW-Mack Rose from Clerk of ence with	0.25 0.00 etiree 0.00 0.00	
97698 1/27/2011 Billed Telephone call w (Saggau)	TIME G:16030 ith International Un	WTJ Legal Service: 3/18/2011 UAW-Mack R on Counsel	0.25 s 0.00 etiree 0.00 0.00	
and Attorney (Niccorrespondence	TIME G:16052 with International lockelhoff); Receipt affrom International locund material in file	nd review of Jnion Counsel;		
97728 2/3/2011 Billed Attendance at S with Attomeys (TIME G:16052 tatus Conference; Saggau and Nickel	WTJ Legal Service 4/4/2011 UAW-Mack F Correspondence noff)		
98491 2/7/2011 Billed Receipt and revi with Attomey (N	TIME G:16052 ew of Court Order; lickelhoff & Saggau	WTJ Legal Service 4/4/2011 UAW-Mack I Correspondence)		
98206 2/23/2011 Billed Receipt and revi International Un	TIME G:16052 iew of corresponde ion Counsel (Sagg	WTJ Legal Service 4/4/2011 UAW-Mack nce from au);		

CLEARY & JOSEM LLP Slip Listing

Slip ID Dates and Time Posting Status Description Correspondence with	ith International Union	Counsel	User Activity Client Reference	Units DNB Time Est. Time Variance
98279 2/28/2011 Billed Telephone call with	TIME G:16052 Attorney (Nickeloff)	4/4/2011	WTJ Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
99162 3/23/2011 Billed Receipt and review	TIME G:16052 of Court Orders	4/4/2011	WTJ Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
99216 3/25/2011 Billed Receipt and review Counsel.	TIME G:16052 of Motion from Oppos		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
Grand Total			Billable Unbillable Total	212.00 0.00 212.00

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Clie.Selection Slip.Transaction Dat Include: UAW-Mack Retiree

4/1/2011 - 8/24/2011

Rate Info - identifies rate source and level

Slip ID Dates and Time Posting Status Description 99717 4/7/2011 Billed Receipt and review	TIME G:16315 of Motion from Class F		User Activity Client Reference CRE Legal Services UAW-Mack Retiree	Units DNB Time Est. Time Variance 0.25 0.00 0.00 0.00
100634 5/6/2011 Billed Telephone call with International Union	TIME G:16382 Attorney for Employer Counsel		WTJ Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
100660 5/9/2011 Billed Attendance at at C	TIME G:16382 ourt Hearing	7/8/2011	WTJ Legal Services UAW-Mack Retiree	1.75 0.00 0.00 0.00
100758 5/12/2011 Billed Receipt and review	TIME G:16382 of Judge's Memorandu		CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
100785 5/13/2011 Billed Receipt and review	TIME G:16382 of Court Order	7/8/2011	WTJ Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
101389 6/3/2011 WIP Receipt and review from Court.	TIME of Order and Correspo	ndence	CRE Legal Services UAW-Mack Retiree	0.25 0.00 0.00 0.00
Grand Total			Billable Unbillable Total	3.00 0.00 3.00

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CERTIFICATE OF SERVICE

I, William T. Josem, hereby certify that on this 8th day of September, 2011, I filed with

the Court the foregoing Declaration of William T. Josem in Support of Request for Interim

Award of Attorneys Fees via the Court electronic Filing System, which will send notice of this

filing to all registered parties via electronic transmission.

/s/ William T. Josem_

WILLIAM T. JOSEM